

June 23, 2000

Mr. Douglas J. Walters
Nuclear Energy Institute
1776 I Street, N.W., Suite 400
Washington, DC 20006-3708

SUBJECT: COMMENTS ON REVISION 1 TO THE NEI 95-10, "INDUSTRY GUIDELINE
FOR IMPLEMENTING THE REQUIREMENTS OF 10 CFR PART 54 - THE
LICENSE RENEWAL RULE"

Dear Mr. Walters:

We have reviewed the changes made in the Revision 1 to NEI 95-10, "Industry Guideline for Implementing the Requirements of 10 CFR Part 54 - The License Renewal Rule" submitted by your letter dated January 24, 2000. Enclosed are our preliminary comments on Revision 1 to NEI 95-10. We understand that you are planning another revision of NEI-95-10 to incorporate additional improvements and lessons learned from the first renewal reviews. We would hope that the additional changes would substantially reflect the changes reflected in the Standard Review Plan for the Review of License Renewal Applications for Nuclear Power Plants (SRP-LR) and the Generic Aging Lessons Learned (GALL) report, to the extent that the industry representatives and the NRC staff have reached a consensus on the review guidance. To that end, we offer the enclosed preliminary comments and suggestions for future changes to NEI 95-10.

If you have any questions regarding this matter, please contact Raj Anand at 301-415-1146.

Sincerely,

/RA/

Christopher I. Grimes, Chief
License Renewal and Standardization Branch
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Project No. 690

Enclosure: As stated

cc w/encl: See next page

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ACCESSION NUMBER - ML003726588

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See previous concurrences*

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NRC STAFF COMMENTS ON REVISION 1 TO NEI 95-10

- (1) In Section 4.1.1- Establishing Evaluation Boundaries, NEI added a new paragraph beginning with "At the component level, it is important to define the component boundaries." It appears that this paragraph was intended to address the evaluation of complex assemblies and the portion of a component that is required to perform the intended function. However, this guidance is not clear. We would suggest that you include examples (e.g., pump casing for function and complex valve assemblies to illustrate the seal and o-ring issues raised in the context of consumables) and elaborate on how component boundaries should be established. You may also want to consider adding guidance to this section on the treatment of "subcomponents."
- (2) Appendix C "Examples to Demonstrate the License Renewal Process" is deleted in Revision 1. The staff considered these examples very useful in illustrating the steps to determine whether and how to perform an aging management review. Specifically, Example # 5 "Complex Assembly Control Room Chillers" provided specific and useful guidelines to determine boundaries for a complex assembly. We recommend that you consider reinstating Appendix C in some form.
- (3) The guidance in Sections 4.1.1 and 4.1.2, along with Figure 4.1-1, Identification of Structures and Components Subject to Aging Management Review, should be clarified to explain the treatment of partial structures, where only a portion is within the scope of license renewal; e.g., the turbine building at the Calvert Cliffs plants.
- (4) Section 4.1.2, should be augmented to address the treatment of anchors and piping segments that provide seismic support to safety related boundary valves. These pipe segments and anchors typically secure safety-related boundary valves to ensure the boundary remains functional during a design basis seismic event.
- (5) Sections 4.2 and 4.3 describe an aging management program with a variety of program elements and attributes. The SRP-LR describes 10 basic attributes of an effective aging management program for license renewal. NEI 95-10 should ultimately reconcile the attributes of an aging management program (AMP), even if the NEI License Renewal Task Force chooses to organize the AMPs separately as condition monitoring programs, inspection programs and sampling inspections.
- (6) As discussed in a letter from C. Grimes, NRC to D. Walters, NEI dated April 20, 1999 the staff proposed a resolution for License Renewal Issue No. 98-0012, Consumables, that clarified the treatment of subcomponents, lubricating and sealing materials, and components replaced based on an established condition monitoring program. We recommend that this guidance be incorporated into Appendix B.
- (7) The groupings of components in Appendix B table in Category E&I/C should be revised as follows:
 - (1) Item # 88 - Transducers have no pressure boundary, similar to thermocouples. Components in Item # 88 needs to be regrouped.
 - (2) Item # 100 - Fuses need to be deleted from this item. Fuses are included in Item # 89.

Enclosure

- (8) In the draft Regulatory Guide, DG-1047, the staff included guidance in Section 3.1- Matters Not Subject to a Renewal Review, and Section 3.2- Resolution of Current Generic Issues. The staff has provided subsequent guidance related to the treatment of Generic Safety Issues. We recommend that comparable guidance be added to NEI 95-10.

In addition, the staff expects that additional lessons will emerge from the resolution of comments on the SRP-LR and the GALL report. We recommend that NEI establish a system to develop corresponding further changes to NEI 95-10 to facilitate the completion of a Regulatory Guide for public comment that would endorse NEI 95-10 with minimal exceptions.

NUCLEAR ENERGY INSTITUTE
(License Renewal Steering Committee)

Project No. 689

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